

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATIONAL EVENT SERVICES, INC.,	:	Civil Action No.: 2:21-cv-04423-GAM
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
NATIONAL FIRE & MARINE	:	
INSURANCE COMPANY;	:	
MEDPRO GROUP;	:	
PETER BEHNKE;	:	
EDGEWOOD HEALTH CARE ADVISORS;	:	
INTEGRO GROUP;	:	
EPIC INSURANCE BROKERS &	:	
ADVISORS;	:	
CRC GROUP;	:	
MAURIZIO BIANCHI, ADMINISTRATOR	:	
OF THE ESTATE OF MARCO BIANCHI, IN	:	
HIS OWN RIGHT, AND ON BEHALF OF	:	
DECEDENT'S NEXT OF KIN;	:	
ALEX BIANCHI;	:	
THE PHILADELPHIA EAGLES;	:	
LINCOLN FINANCIAL FIELD,	:	
	:	
Defendants.	:	
	:	
	:	

**NATIONAL FIRE & MARINE INSURANCE COMPANY AND MEDPRO GROUP'S
MOTION TO SEVER AND STAY BAD FAITH CLAIM**

Defendants National Fire & Marine Insurance Company ("NF&M") and MedPro Group ("MedPro"), by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 21, hereby file the within Motion to Sever and Stay Bad Faith Claim.

For the reasons set forth in detail in the accompanying Brief in Support of Motion to Sever and Stay Bad Faith Claim, which is incorporated herein by reference, NF&M and MedPro respectfully request that this Honorable Court enter an order granting severance of the bad faith claim set forth in count III of Plaintiff's Complaint from the remaining claims in this action, and stay the severed bad faith claim pending conclusion of the declaratory judgment (count I) and

negligence (count II) claims in Plaintiff's Complaint. In the alternative, NF&M and MedPro respectfully requests that this Honorable Court grant bifurcation of the bad faith claim from the remaining claims in this action, and stay discovery of the bad faith claim pending conclusion of the declaratory judgment and negligence claims in Plaintiff's Complaint.

WHEREFORE, Defendants National Fire & Marine Insurance Company and MedPro Group respectfully requests that this Honorable Court enter the attached Order.

Dated: November 17, 2022

Respectfully submitted,

HOUSTON HARBAUGH, P.C.

/s/ R. Brandon McCullough

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Counsel for Defendants

*National Fire & Marine Insurance Company and
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NATIONAL FIRE & MARINE INSURANCE COMPANY AND MEDPRO GROUP's MOTION TO SEVER AND STAY BAD FAITH CLAIM** was e-filed through the CM/ECF system, which will send notice to all counsel of record, this 17th day of November, 2022.

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